

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

FEDERAL TRADE COMMISSION, *et al.*,

Plaintiffs,

v.

AMAZON.COM, INC., a corporation,

Defendant.

CASE NO. 2:23-cv-01495-JHC

**STIPULATED MOTION AND
ORDER TO SEAL CERTAIN
EXHIBITS TO THE PARTIES' MAY
28, 2025 JOINT STATUS REPORT**

NOTE ON MOTION CALENDAR:
June 11, 2025

The parties, by and through their attorneys of record, respectfully request that the Court enter the proposed order set forth below, permanently sealing certain exhibits to the parties' May 28, 2025 Joint Status Report, ECF Nos. 485-1 and 485-2 (sealed exhibits).

In support of this request, the parties represent the following to the Court:

1. On May 28, 2025, Amazon provisionally filed under seal the parties' Joint Status Report, ECF No. 484 (redacted submission), and three accompanying exhibits attached to that submission, one sealed (Exhibit B) and one with redactions (Exhibit C).

1 2. Pursuant to Local Civil Rule 5(g)(3)(A), undersigned counsel certify that they met
2 and conferred to reach the agreement described in this Stipulated Motion. The
3 following attorneys conferred by phone and by email on May 28, 2025, and
4 June 9, 2025: Leigh Barnwell and Ed Takashima for the FTC; and Katherine
5 Trefz for Amazon.

6 3. Amazon filed a public version of the Joint Status Report redacting certain
7 language from an Amazon business document attached to the Joint Status Report
8 as Exhibit B. The parties agree that these redacted portions can be unsealed.

9 4. The one sealed and one redacted exhibit accompanying the Joint Status Report,
10 ECF Nos. 485-1 and 485-2, consist of an Amazon business document produced in
11 this litigation and the deposition transcript of an Amazon witness. These
12 documents are designated under the February 13, 2024 Protective Order in this
13 case, ECF No. 160, and contain confidential business information, disclosure of
14 which could cause Amazon economic and competitive harm.

15 5. The parties stipulate as follows, subject to Court approval, and jointly request that
16 the Court enter the following Order approving this Stipulation:

17 a. the previously-sealed Joint Status Report, ECF 485, will be filed to the
18 public docket;

19 b. only the highlighted portions in the redacted Exhibit C (the deposition
20 transcript) accompanying the Joint Status Report, ECF No. 485-2, will
21 remain sealed; and

22 c. the Amazon company business document attached as Exhibit B to the
23 Joint Status Report, ECF No. 485-1, will remain sealed.

Stipulated to and respectfully submitted this 11th day of June, 2025, by:

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ORDER

Pursuant to the parties' stipulation, the Court ORDERS:

- The previously-sealed Joint Status Report, ECF No. 485, (i.e., the main document, excluding the attached exhibits) will be filed on the public docket.
- The Amazon company business document attached as Exhibit B to the Joint Status Report, ECF No. 485-1, will remain sealed.
- It appears that the parties ask the Court to unseal all but the highlighted portions of the deposition transcript attached as Exhibit C to the Joint Status Report, ECF No. 485-2. But a version of this document with the highlighted portions remaining under seal is already attached to the public version of the Joint Status Report, ECF No. 484 at 38–53. Thus, the document at ECF No. 485-2 will remain sealed. If the parties believe that the Court has misunderstood their request as to this document, they may file another stipulated motion.

DATED this 12th day of June, 2025.



JOHN H. CHUN
UNITED STATES DISTRICT JUDGE